

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America  
v.  
CHARLES DEAN LACK

Case No. MJ-22-561-STE

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2022 in the county of McClain in the  
Western District of Oklahoma, the defendant(s) violated:

*Code Section*

Title 18, United States Code,  
Section 875(c)

*Offense Description*

Transmitting a Communication in Interstate Commerce Containing a Threat  
to Injure Another

This criminal complaint is based on these facts:

See Attached Affidavit of FBI Special Agent Audra Rees

☒ Continued on the attached sheet.



*Complainant's signature*

Audra Rees, FBI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: Aug 6, 2022

City and state: Lawton, Oklahoma



*Judge's signature*

Shon T. Erwin, United States Magistrate Judge

*Printed name and title*

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF  
COMPLAINT AND ARREST WARRANT**

I, Audra Rees, Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), where I investigate violations of federal criminal law. I have been a Special Agent with the FBI since 2020. I am currently assigned to the Joint Terrorism Task Force of the Oklahoma City FBI office. During my career, I have conducted investigations involving violations of federal criminal law relating to, but not limited to, counterterrorism, national security, threats, and firearms-related offenses.

2. I have personally participated in the investigation set forth below. The facts in this Affidavit come from my personal observations, my review of documents related to this investigation, oral and written communications with others who have personal knowledge of the events and circumstances described herein, a review of public source information including information available on the Internet, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show there is sufficient probable cause for the requested complaint and arrest warrant, but does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts set forth in this Affidavit, I believe there is probable cause to believe that **Charles Dean LACK (LACK)** has transmitted in interstate commerce a communication containing a threat to injure another in violation of Title 18 U.S.C. § 875(c).

**In support thereof, your Affiant states the following:**

**INVESTIGATION TO DATE**

4. On or about August 5th, 2022, the FBI electronically received a tip via the FBI's National Threat Operations Center (NTOC) in Clarksburg, West Virginia, from an individual who identified themselves as Charles Dean Lack submitted their information as:

First Name: Dean  
Middle Name:  
Last Name: Lack  
DOB: XX/XX/1966<sup>1</sup>  
Phone Type: Cell  
International: False  
Phone Number: 4053177491  
Phone Ext:  
Email: [deanlack55@aol.com](mailto:deanlack55@aol.com)  
Type: Residential  
Address: 415 webster dr.  
City: Wayne  
State: OK  
Zip: 73096  
Additional Info:

The text the individual submitted is as follows:

“I’m Charles Dean Lack retired as an Oklahoma City police officer /pilot I’m fixing to head to will Rogers airport in okc to start killing every homeland security’s employees for being corrupt and illegally holding my future wife in custody I have all the proof and willing to give my life for her if it takes in

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<sup>1</sup> **LACK** provided his full date of birth, which has been redacted in this affidavit.

killing everyone that is involved in this corrupt world of government employees I don't care if my life gets taken because several will go before I do, I turned this in to the FBI several months ago and nothing has been done so I feel like I should go solve this problem to get my future wife to get where she belongs and it's not with homeland security at the airport. I'm not drunk and on no drugs I'm very healthy and capeable of making everything happen even willing to let anyone try to stop me from stopping illegal homeland security guards to keep breaking the law. Enough is enough."

5. The individual that made the tip listed a victim of a crime, R.R.<sup>2</sup>, provided a date of birth, and listed the address as "California, CA." The individual, based on a previous tip, seems to believe that Homeland Security at the Will Rodgers World Airport (WRWA) is holding R.R. against her will. According to open-source information, R.R. is a famous MMA fighter. She is currently married to another famous MMA fighter and they live in California.

6. The threat that was submitted on August 5, 2022, caused great concern to WRWA officials. The Assistant Federal Security Director (AFSD) stated, in regards to whether or not this was perceived as a true threat, said "absolutely." The AFSD was concerned specifically because of **LACK**'s knowledge of aviation, airport layout, police tactics, and weapons training. **LACK** is a retired police officer who is also a trained pilot.

7. The IP address that submitted the tip was captured. The Internet Service Provider (ISP) provided FBI with information that the registered user of the IP address is Dean Lack. The Service Address is 415 Webster Dr, Wayne, OK 73095, telephone number

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<sup>2</sup> **LACK** provided the first and last name, but it has been redacted to the first name and last name initials in this affidavit.

405-449-3107. The billing address is PO Box 268, Wayne, OK 73095, and an alternate telephone number is listed as 205-317-7491. This IP address was started July 13, 2022, at 01:00:23 CST and was current to the EDR on August 5, 2022, at 18:01:55 CST.

8. On June 23, 2022, **LACK** submitted a tip to NTOC that included the same user information (name, DOB, cell phone number, address). The IP address used was different at the time. The following text was submitted in regards to the tip:

“She is my future wife flew in from California and tge [sic] homeland security has corrupt her and I they will not release her to her freedom they keep her as a hostage in the airport in Oklahoma City she needs the FBI to get her out of there and don’t try to get her to pay any fee or anything until the FBI does their job and don’t be a corrupt idiot get her out of there before there is murder starts going on there to stop the homeland security corrupt idiots to keep doing this and I have sent this 3 : times now so just get to doing your damn job or come get me and put me in prison where I will start taking matters into my own hands is what they need anyway.”

9. In connection with the incident on June 23, 2022, local police made contact with **LACK**. **LACK** told the officer that arrived that **LACK** had recent health issues. **LACK** told the officers that R.R. was coming to visit him, but that she got detained at the airport by Homeland Security at the airport. **LACK** denied being involved in a monetary scam.

10. On or about August 6, 2022, FBI made contact with **LACK** at his residence, the SUBJECT PREMESIS. **LACK** was Mirandized, stated that he knew his rights, and answered questions. **LACK** stated that he has been talking with who he believes to be R.R. for some time now. They used to communicate through Google Hangouts and now

communicate via Telegram. R.R. calls **LACK** once a day. They have never video-chatted. **LACK** stated R.R. is being held against her will at the WRWA. **LACK** admitted to making the threat but stated he did not intend to carry it out. **LACK** said that no one would do anything about his concerns until he threatened to go to the airport and kill HSI agents. **LACK** visited the airport on 3 separate occasions to determine where HSI is in the airport. **LACK** intended the statement submitted to NTOC to be taken as a threat. **LACK** knew it would likely be taken as a threat. **LACK** made the threat to get the attention of various officials. **LACK** saw how much attention recent mass shootings have garnered and wanted to gain attention. Besides R.R., **LACK** said that he had a strange interaction with a person he believed to be Christopher Wray, who **LACK** is fairly certain is an FBI Agent.<sup>3</sup> “Wray” asked **LACK** to send Wray \$700, then Wray promised to send **LACK** 7 million dollars. **LACK** denied sending money to Wray. **LACK** did send money to R.R. **LACK** thinks it is around \$1200 **LACK** sent to R.R. so far. **LACK** denied that he had no lasting brain injury from a previous motorcycle wreck.

### CONCLUSION

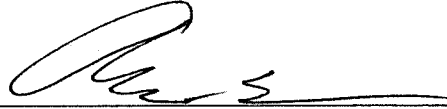
11. Based on the aforementioned information, I believe there is probable cause to believe that **Charles Dean LACK** communicated a threat to injure another transmitted in interstate commerce in violation of 18 U.S.C. § 875(c).

12. It is therefore requested that a complaint and arrest warrant issue for the offense listed above.

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<sup>3</sup> Christopher Wray is the Director of the FBI.

FURTHER YOUR AFFIANT SAYETH NOT.

A handwritten signature in black ink, appearing to read 'Rees', written over a horizontal line.

Audra Rees, Special Agent  
Federal Bureau of Investigation

SUBSRIBED AND SWORN to before me this 6<sup>th</sup> day of August, 2022.

A handwritten signature in blue ink, reading 'Shon T. Erwin', written over a horizontal line.

SHON T. ERWIN  
UNITED STATES MAGISTRATE JUDGE